

OCT 27 2022

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

LUCAS RUSSELL VANWOERT,

Defendant.

INDICTMENT

CASE NO.

3:22 CR 618

Title 18, United States Code,
Sections 48(a)(2)(A), 1465,
2252(a)(1) and 2252(a)(4)(B).

JUDGE KNEPP

COUNT 1

(Creation of an Animal Crush Video, 18 U.S.C. § 48(a)(2)(A))

The Grand Jury charges:

1. On or about August 28, 2022, in the Northern District of Ohio, Western Division, Defendant LUCAS RUSSELL VANWOERT, did knowingly create an animal crush video, intending or having reason to know that the animal crush video would be distributed in, or using a means or facility of, interstate or foreign commerce, in violation of Title 18, United States Code, Section 48(a)(2)(A)).

COUNT 2

(Production and Transportation of Obscene Materials, 18 U.S.C. § 1465)

The Grand Jury further charges:

2. From on or about April 15, 2022 to on or about September 27, 2022, in the Northern District of Ohio, Western Division, and elsewhere, Defendant LUCAS RUSSELL VANWOERT, did knowingly produce with the intent to transport, distribute, and transmit in

ORIGINAL

interstate or foreign commerce, and did knowingly transport or travel in, and did use a facility and means of interstate or foreign commerce, for the purpose of sale or distribution of any obscene material, in violation of Title 18, United States Code, Section 1465.

COUNT 3

(Transportation of Visual Depictions of Minors Engaged in Sexually Explicit Conduct, 18 U.S.C. § 2252(a)(1))

The Grand Jury further charges:

3. From on or about April 1, 2022 through on or about September 27, 2022, in the Northern District of Ohio, Western Division, and elsewhere, Defendant LUCAS RUSSELL VANWOERT, did knowingly and intentionally transport, using a means and facility of interstate or foreign commerce, and the transportation of the visual depiction involved the use of a minor engaged in sexually explicit conduct, and such visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(1).

COUNT 4

(Possession of Visual Depictions of Minors Engaged in Sexually Explicit Conduct, 18 U.S.C. § 2252(a)(4)(B))

The Grand Jury further charges:

4. On or about September 27, 2022, in the Northern District of Ohio, Western Division, Defendant LUCAS RUSSELL VANWOERT, did knowingly possess a Lenovo Laptop computer which contained one or more books, magazines, periodicals, films, videos tapes, or other matter which contain any visual depiction that had been mailed, or had been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which had been mailed or so shipped or transported, by any means including by computer, where the producing of such visual depiction involved the use of a minor engaged in sexually explicit conduct, and such

visual depiction was of such conduct and at least one image involved in the offense involved a prepubescent minor or a minor who had not attained 12 years of age, in violation of Title 18, United States Code, Section 2252(a)(4)(B).

FORFEITURE

The Grand Jury further charges:

5. The allegations contained in Counts 1 through 4 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a) and Title 18, United States Code, Section 2428(a). As a result of the foregoing offenses, defendant LUCAS RUSSELL VANWOERT shall forfeit to the United States: (i) with respect to Counts 1 through 4, all visual depictions described in Title 18, United States Code, Sections 2251 and 2252, and all books, magazines, periodicals, films, videotapes, and other matter which contain any such visual depictions, which were produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110; (ii) all property, real and personal, used - or was intended to be used - to commit or to promote the commission of the offenses charged in Counts 1 through 4, and all property traceable to such property; (iii) all property, real and personal, constituting - or traceable to - gross profits or other proceeds obtained from the offenses charged in Counts 1 through 5; (iv) all property, real and personal, that was used - or was intended to be used - to commit or to facilitate the commission of the offense charged in Counts 1 through 4; and, (v) all property, real and personal, constituting - or derived from - any proceeds that the defendant obtained, directly or indirectly, as a result of the offense charged in Counts 1 through 4; including, but not limited to, the following:

- a. Lenovo Laptop with a (1) terabyte Western Digital hard drive (S/N: WD-WXM1AC6FT6XC; and

b. Samsung Galaxy phone.

A TRUE BILL.

Original document—Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.